REMARKS

Claims 1-6, 8-18, and 20 remain in the application. Claims 1, 8 and 13 have been amended. Claims 7 and 19 have been cancelled. Applicant respectfully requests allowance of each of the pending claims.

In the prior office action, Claims 1, 8 and 13 were rejected under 35 U.S.C. §112, second paragraph, and the amendments to these claims now clearly indicate that it is the "de-scrambled set of faults" that are compared. The rejections to these claims have been overcome.

With regard to the independent claims 1, 8 and 13, the Examiner indicated in the last round of communications that the rejection under 35 U.S.C. §103(a) was not properly responded to with regard to U.S. Patent No. 5,748,641 ("Ohsawa"). The Examiner agreed that other prior art references did not teach the use of a scrambler and descrambler, but the Examiner believed that Ohsawa taught the use of the scrambler and descrambler.

Ohsawa does disclose the use of a scrambler and descrambler in a memory testing system, but the application of them in Ohsawa is not the same as the claimed invention. The claimed invention introduces a set of faults into an embedded memory behavior model, and stimulates a built-in self-test circuit and the embedded memory behavior model. The built-in self-test circuit generates input data and address patterns for the embedded memory behavior model so that it outputs memory address and data in response to the input data and address patterns. The output memory address and data are compared with the input data and address in the built-in self-test circuit to generate a fault output if they do not match. At this moment, the set of faults initially introduced are descrambled so that they are compared with the fault output to verify the performance of the built-in self-test circuit. In Ohsawa, the descrambler descrambles the data read out from the memory so that the error detection circuit can perform the

comparison before the data is sent to the output circuit (see col. 7, lines 14-29). As such, Ohsawa descrambles the data read out from the memory, but fails to teach the descrambling of the set of faults. Therefore, Ohsawa is deemed as distinguishable and all three independent claims 1, 8, and 13 should be allowed.

Claims 2-6, 9-12, and 14-18 and 20 depend on claims 1, 8, and 13 respectively, and for the same reason stated above, they should be allowed.

Respectfully submitted,

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Howard Chen, Reg. No.: 46,615

Attorney For Applicants

DUANE MORRIS LLP 1 Market Street, Spear Tower, Suite 2000 San Francisco, CA 94105-1104 (415) 371-2000 (Telephone) (415) 371-2201 (Fax)